

Nathan Ochsner, Clerk of Court

contained therein.

2. Plaintiff admits that a bench trial is currently scheduled for December 5, 2022, but denies that Plaintiff will not be prejudiced by Attorney's withdrawal. Plaintiff lacks knowledge or information sufficient to form a belief about the truth of the allegation that Defendant will not be prejudiced by Attorney's withdrawal.

3. Plaintiff lacks knowledge or information sufficient to form a belief about the truth of the allegations contained therein.

4. Admitted.

5. Plaintiff lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in this paragraph.

6. Admitted.

II. Additional Relevant Matters

Plaintiff respectfully provides the Court the following the additional information and relevant matters:

7. Attorney has not established good cause for his attempted withdrawal under any applicable Federal or State Rules or case law.

8. Various Attorney actions and inactions in this lawsuit have adversely affected Plaintiff's chances of prevailing in this lawsuit, including but not limited to:

a. Attorney failed to timely and properly request a jury;

b. Attorney failed to timely and properly amend the pleadings in accordance with the Court's current Scheduling Order.

c. Attorney failed to timely and properly designate experts in accordance with the Court's

current Scheduling Order.

d. Attorney has failed to adequately obtain and review documents and other items which would support Plaintiff's causes of action and to have those reviewed by competent experts who could then testify about same.

e. Attorney has failed to conduct any discovery.

9. Various Attorney actions and inactions in this lawsuit, as partially related in (8) herein, have adversely affected Plaintiff's chances of finding competent counsel, at a reasonable price, if Attorney is allowed to withdraw.

10. Plaintiff has paid all required fees to Attorney, pursuant to a written fee agreement, and will continue to do so in the future.

III. Request for Oral Hearing

Plaintiff requests an oral Hearing on this matter, such Hearing is not sought for purposes of delay, but in the interests of fairness and justice, and Plaintiff believes oral argument would be helpful to the Court.

IV. Relief Requested

Plaintiff requests that the Motion be denied in all respects and that Attorney be additionally ordered to continue to diligently and zealously represent Plaintiff on all aspects of this lawsuit, through completion of this lawsuit, including trial if necessary.

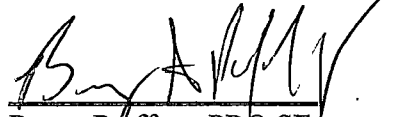
V. Prayer

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that the Court deny the Motion in all respects and that Attorney be additionally ordered to continue to diligently and zealously represent Plaintiff on all aspects of this lawsuit, through completion of this lawsuit,

including trial if necessary and for such other and further relief as the Court deems appropriate in the interests of justice.

Dated: June 28, 2022

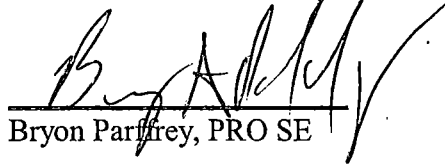
Respectfully submitted,



Bryon Parffrey, PRO SE
2610 Tudor Manor
Houston, Texas 77082
Tel.: (281) 782-7966
Fax: (281) 588-5821
E-Mail bryon@buildersacademy.com
DEFENDANT (ACTING PRO SE
ONLY ON THIS MOTION)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all counsel of record by fax in accordance with the Federal Rules of Civil Procedure on this the 28th day of June, 2022.



Bryon Parffrey, PRO SE